

Exhibit 1

From: Scolnick, Kahn A. <KScolnick@gibsondunn.com>
Sent: Monday, March 4, 2024 5:21 PM
To: GLORIA JUAREZ, ESQ. LAW <gloria@thegjlaw.com>
Cc: Miller, Gillian B. <GMiller@gibsondunn.com>; A A <aa@thegjlaw.com>
Subject: Re: Ahmad v. UnitedHealth Group et al. (CD Cal. No. 23cv2303)

I'm not sure what you're asking us to do. Would you like a list of anticipated arguments in our motion, and if so, would you then provide responses? Again I'm not trying to be difficult but the court rules envision some real dialogue before we file. If you're unwilling to get on a call or zoom, then please let us know what info you'd like via email.

On Mar 4, 2024, at 5:18 PM, GLORIA JUAREZ, ESQ. LAW <gloria@thegjlaw.com> wrote:

[WARNING: External Email]

Is there a reason why we have not been able to meet and confer by email? That's been requested a number of times.

Thank you

On Mon, Mar 4, 2024, 9:09 AM Scolnick, Kahn A. <KScolnick@gibsondunn.com> wrote:

Good morning Gloria. Any availability for a call/zoom today or tomorrow? Thanks.

Kahn A. Scolnick

T: +1 213.229.7656
KScolnick@gibsondunn.com

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071-3197

From: Scolnick, Kahn A.
Sent: Friday, March 1, 2024 9:00 AM
To: 'GLORIA JUAREZ, ESQ. LAW' <gloria@thegjlaw.com>
Cc: Miller, Gillian B. <GMiller@gibsondunn.com>
Subject: RE: Ahmad v. UnitedHealth Group et al. (CD Cal. No. 23cv2303)

Can I just give you a call this morning? I'm sorry to make this difficult but the court expects some actual interaction and not just an email. If you're not available at all today, could we try Monday? I think it'll take just 10 minutes or so, but we'd appreciate something beyond just exchanging emails.

Kahn A. Scolnick

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From: GLORIA JUAREZ, ESQ. LAW <gloria@thegjlaw.com>
Sent: Friday, March 1, 2024 8:57 AM
To: Scolnick, Kahn A. <KScolnick@gibsondunn.com>
Cc: Miller, Gillian B. <GMiller@gibsondunn.com>
Subject: Re: Ahmad v. UnitedHealth Group et al. (CD Cal. No. 23cv2303)

[WARNING: External Email]

Possible to meet and confer by email today?

Thanks

On Thu, Feb 29, 2024, 9:07 AM Scolnick, Kahn A. <KScolnick@gibsondunn.com> wrote:

sorry to hear it, hope all is ok. If you're able to do a zoom call tomorrow, please let us know.

From: GLORIA JUAREZ, ESQ. LAW <gloria@thegilaw.com>
Sent: Thursday, February 29, 2024 9:00 AM
To: Scolnick, Kahn A. <KScolnick@gibsondunn.com>
Subject: Re: Ahmad v. UnitedHealth Group et al. (CD Cal. No. 23cv2303)

[WARNING: External Email]

Counsel,

I have a personal emergency that precludes my attendance at our meeting today.

GJ

On Wed, Feb 28, 2024, 10:06 AM Scolnick, Kahn A. <KScolnick@gibsondunn.com> wrote:

Thank you, we just sent an invite – talk to you tomorrow.

Kahn A. Scolnick

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From: GLORIA JUAREZ, ESQ. LAW <gloria@thegilaw.com>
Sent: Wednesday, February 28, 2024 8:57 AM
To: Scolnick, Kahn A. <KScolnick@gibsondunn.com>
Cc: A A <aa@thegilaw.com>; Miller, Gillian B. <GMiller@gibsondunn.com>
Subject: Re: Ahmad v. UnitedHealth Group et al. (CD Cal. No. 23cv2303)

[WARNING: External Email]

How about 10 am on Thursday?

Thanks

On Tue, Feb 27, 2024, 2:39 PM Scolnick, Kahn A. <KScolnick@gibsondunn.com> wrote:

LR 7-3 says the meet/confer is “preferably” supposed to be “in person,” but we often do it over Zoom these days. Would a Zoom meeting work, even if on Thursday or Friday? Based on past experience, the court might be concerned if we don’t at least connect via Zoom.

One pressing question I have for you is whether Ms. Ahmad ever actually enrolled in a United MA plan—the complaint suggests otherwise, but I’d appreciate you confirming one way or the other.

Thanks.

Kahn A. Scolnick

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From: GLORIA JUAREZ, ESQ. LAW <gloria@thegilaw.com>

Sent: Tuesday, February 27, 2024 1:34 PM

To: Scolnick, Kahn A. <KScolnick@gibsondunn.com>

Cc: A A <aa@thegilaw.com>; Miller, Gillian B. <GMiller@gibsondunn.com>

Subject: Re: Ahmad v. UnitedHealth Group et al. (CD Cal. No. 23cv2303)

[WARNING: External Email]

Hello,

Could we meet and confer by email?

We just got bogged down with unexpected proceedings and another urgent filing which is imminently due.

I understand you will be filing a motion to dismiss. I'd like to learn more about the pleading defects which you are citing. Please let me know how we can proceed.

Thanks

On Mon, Feb 26, 2024, 11:39 AM Scolnick, Kahn A. <KScolnick@gibsondunn.com> wrote:

Yes, please do. Sounds like the Wednesday slots might be the best option, but please let us know once you resurface tomorrow. Thanks.

Kahn A. Scolnick

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From: GLORIA JUAREZ, ESQ. LAW <gloria@thegjlaw.com>

Sent: Monday, February 26, 2024 11:19 AM

To: Scolnick, Kahn A. <KScolnick@gibsondunn.com>

Cc: A A <aa@thegjlaw.com>; Miller, Gillian B. <GMiller@gibsondunn.com>

Subject: Re: Ahmad v. UnitedHealth Group et al. (CD Cal. No. 23cv2303)

[WARNING: External Email]

Good morning!

Yes, we will look forward to meeting with you.

We are dealing with an urgent filing due today and a hearing in the morning.

Can we touch base after that?

Thanks

On Mon, Feb 26, 2024, 10:51 AM Scolnick, Kahn A. <KScolnick@gibsondunn.com> wrote:

Hi Gloria, just checking to see if any of these times work for you to discuss our anticipated MTD. Thanks.

- Today 3-5 pacific
- Tuesday 10-12 pacific
- Wednesday 10-12 pacific
- Wednesday 3-5 pacific

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From: Scolnick, Kahn A.

Sent: Friday, February 23, 2024 2:54 PM

To: GLORIA JUAREZ, ESQ. LAW <gloria@thegjlaw.com>

Cc: A A <aa@thegjlaw.com>; Miller, Gillian B. <GMiller@gibsondunn.com>

Subject: RE: Ahmad v. UnitedHealth Group et al. (CD Cal. No. 23cv2303)

Sorry, slight update on our available times next week. Thanks.

- Monday 3-5 pacific
- Tuesday 10-12 pacific
- Wednesday 10-12 pacific
- Wednesday 3-5 pacific

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Sent: Friday, February 23, 2024 10:22 AM
To: GLORIA JUAREZ, ESQ. LAW <gloria@thegjlaw.com>
Cc: A A <aa@thegjlaw.com>; Miller, Gillian B. <GMiller@gibsondunn.com>
Subject: Ahmad v. UnitedHealth Group et al. (CD Cal. No. 23cv2303)

Hi Gloria, as anticipated, the United defendants will be moving to dismiss the complaint under Rule 12(b)(6). Can you please let us know if you're available at any of the below times next week for a meet-and-confer discussion about our proposed motion? Thanks.

- Monday 230-5 pacific
- Tuesday 10-12 pacific
- Wednesday 10-12 pacific
- Wednesday 3-5 pacific

Kahn A. Scolnick

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